

Jeffrey I. Hasson  
Attorney at Law  
Davenport & Hasson, LLP  
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Washington State Bar No. 23741

The Honorable Ronald B. Leighton

Attorney for Columbia Collectors, Inc. dba CCI Billing Systems

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

MICHELLE ECHLIN FKA MICHELLE  
SIMKINS, on behalf of herself and all others  
similarly situated,

Plaintiffs,

vs.

COLUMBIA COLLECTORS, INC. DBA CCI  
BILLING SYSTEMS,

Defendant.

Case No.: 3:12-CV-05878-RBL

DECLARATION OF JEFFREY I. HASSON

I, Jeffrey I. Hasson, hereby declare and state:

I am an attorney at law duly licensed and authorized to practice law in the State of Washington, and the United States District Court for the Western District of Washington. I am a partner at Davenport & Hasson, LLP, and I am the attorney primarily responsible for the handling of the above matter. I make the following declaration based upon my own personal knowledge, and could competently testify as such if called as a witness.

On November 21, 2012, Defendant Columbia Collectors, Inc. sent Plaintiff through its

DECLARATION OF JEFFREY I. HASSON - 1  
Case No. 3:12-CV-05878-RBL

**DAVENPORT & HASSON, LLP**  
Attorneys at Law  
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Portland, OR 97230  
Telephone No. (503) 255-5352  
Facsimile No. (503) 255-6124

1 counsel an Offer of Judgment (“the Offer”) pursuant to *FRCP* 68. A copy is attached as Exhibit  
2 “1”, and a copy of the mailing certificate is set forth on the last page of Exhibit “1”.

3 As of December 1, 2012, 10 days after service was provided, Defendant received no written  
4 notice that Plaintiff had accepted the Offer.

5 I declare under penalty of perjury under the laws of the State of Washington that the  
6 foregoing is true and correct:

7 Dated: December 19, 2012 at Portland, Oregon.

8 s/ Jeffrey I. Hasson

Jeffrey I. Hasson, WSBA No. 23741

Davenport & Hasson, LLP

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*Attorney for Columbia Collectors, Inc. dba CCI  
Billing Systems*

14 r

# EXHIBIT

# 1.

1 Jeffrey I. Hasson  
Attorney at Law  
2 Davenport & Hasson, LLP  
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3 Portland, OR 97230  
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5 Washington State Bar No. 23741

6 Attorney for Columbia Collectors, Inc. dba CCI Billing Systems  
7  
8  
9

10 UNITED STATES DISTRICT COURT  
11 WESTERN DISTRICT OF WASHINGTON  
12 AT TACOMA

13 MICHELLE ECHLIN FKA MICHELLE  
SIMKINS,

14 Plaintiff,

15 vs.

16 COLUMBIA COLLECTORS, INC. DBA CCI  
17 BILLING SYSTEMS,

18 Defendant.

Case No.: 3:12-CV-05878-RBL

COLUMBIA COLLECTORS, INC. DBA CCI  
BILLING SYSTEMS'S OFFER OF  
JUDGMENT

19 Columbia Collectors, Inc. dba CCI Billing Systems ("CCI"), defendant in the above  
20 entitled Action, on behalf of itself, and its employees, by and through Jeffrey I. Hasson, its  
21 attorney of record, offers, pursuant to FRCP 68 to allow Judgment in favor of plaintiff against  
22 CCI to be entered in the amount of One Thousand Five hundred and 00/100ths Dollars  
23 (\$1,500.00), plus costs, disbursements and reasonable attorney's fees as determined by the Court.  
24 FRCP 68 provides, *inter alia*, that this offer is automatically withdrawn if it is not accepted  
25 within ten (10) days of service.  
26

COLUMBIA COLLECTORS, INC. DBA CCI BILLING  
SYSTEMS'S OFFER OF JUDGMENT - 1  
Case No. 3:12-CV-05878-RBL

DECLARATION OF JEFFREY I. HASSON - 4  
Case No. 3:12-CV-05878-RBL

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Facsimile No. (503) 255-6124

1 This offer does not settle any claims being collected by CCI against plaintiff.

2 Dated: November 21, 2012.

3 DAVENPORT & HASSON, LLP

4 s/ Jeffrey I. Hasson

5 Jeffrey I. Hasson, WSBA#23741

6 Attorney for CCI

7 Plaintiff accepts CCI's Offer of Judgment and agrees to compromise of the amounts due  
8 herein by entry of judgment in favor of plaintiff and against CCI in the amount of One Thousand  
9 Five Hundred and 00/100ths Dollars (\$1,500.00), plus costs, disbursements and reasonable  
10 attorney's fees as determined by the Court.

11 This offer does not settle any claims being collected by CCI against plaintiff.

12 Dated: \_\_\_\_\_

13 \_\_\_\_\_  
14 Jon N. Robbins, WSBA#28991

15 Weisberg & Meyers, LLC

16 Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I served a true and complete copy of the foregoing Offer of Judgment  
on November 21, 2012 to;

Jon N. Robbins  
Weisberg & Meyers, LLC  
3877 N. Deer Lake Rd.  
Loon Lake, WA 99148

☒ Via First Class Mail

☐ Via Facsimile

☐ Via Hand Delivery

☒ Via Electronic Mail to jrobbins@AttorneysForConsumers.com

DATED November 21, 2012

DAVENPORT & HASSON, LLP

  
s/ Jeffrey I. Hasson

WSBA No. 23741

Davenport & Hasson, LLP

12707 NE Halsey St.

Portland, OR 97230

Telephone: (503) 255-5352

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*Attorney for Columbia Collectors, Inc. dba CCI  
Billing Systems*

CERTIFICATE OF SERVICE - 1

Case No. 3:12-CV-05878-RBL

DECLARATION OF JEFFREY I. HASSON - 6

Case No. 3:12-CV-05878-RBL

DAVENPORT & HASSON, LLP

Attorneys at Law

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Certificate of Service

I hereby certify that on December 19, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Jon N. Robbins and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

s/ Jeffrey I. Hasson  
Jeffrey I. Hasson, WSBA No. 23741  
Attorney for Columbia Collectors, Inc. dba CCI  
Billing Systems  
Davenport & Hasson, LLP  
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